UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

TIMOTHY P. NEUMANN, ESQ. [TN6429] BROEGE, NEUMANN, FISCHER & SHAVER, L.L.C. 25 Abe Voorhees Drive Manasquan, NJ 08736 (732) 223-8484 tneumann@bnfsbankruptcy.com Attorneys for Debtor-in-Possession American Center for Civil Justice, Inc.

In Re:

AMERICAN CENTER FOR CIVIL JUSTICE, INC.,

Debtor.

Case No.: 18-15691

Chapter 11

Judge: Christine M. Gravelle

CERTIFICATION OF JEDIDIAH PERR IN OPPOSITION TO MOTION OF JOSHUA AMBUSH FOR APPOINTMENT OF A CHAPTER 11 TRUSTEE

Jedidiah Perr, of full age, hereby certifies, as follows:

- 1. I make this Certification to the best of my knowledge or recollection.
- In year 2000 I was one of the board members of a newly-founded 501c3 organization Freedom of Religion ("FOR").
- 3. Some of the missions of the organization included advocating on behalf of victims of religious persecution and discrimination, and the victims of cults.
- 4. At the time, 18 years ago, FOR requested a grant from the American Center for Civil Justice (ACCJ) for \$1 million dollars. The ACCJ had recently received significant fees from a terror case it has sponsored and therefore was in a position to assist the FOR. One of ACCJ's mission's was to work with and assist other organizations with complimentary goals.
- 5. The human rights mission of the FOR was consistent with the mission of the ACCJ.
- 6. I was not then a member of, or involved with, the ACCJ.

Case 18-15691-CMG Doc 73 Filed 06/05/18 Entered 06/05/18 23:34:06 Desc Main Document Page 2 of 2

7. The Grant was approved by ACCJ's Board, including Board member Michael Engelberg. Indeed,

in the Engelberg v Perr lawsuit in Nassau County Supreme Court, Engelberg alleges many

complaints but does not mention the donation to FOR as being improper.

8. FOR was involved in having at least one law suit filed on behalf of US citizens who were victims

of a US-based cult resulting in a death of a teenage girl. Another suit was filed on behalf of a

young boy, educationally handicapped, whose school district refused to provide the educational

services i.e. therapy etc., as required by law. These cases were sponsored or initiated by the FOR.

9. I never received a salary from FOR more than two thousand dollars a month, and the last year

that I received salary from FOR was 2004. I did not receive any other money from FOR.

10. In year 2005 I began working for the American Center of Civil Justice, Religious Liberty and

Tolerance and devoting my energies towards its goals, one of them being, developing methods to

assist victims of terrorism, by enforcing victims' multimillion dollar judgments. Here too, for the

next 7 years I didn't receive a salary of more than two thousand dollars a month.

11. In years 2009 and 2010, while I still held a position at FOR, most of the original grant money

received was still intact.

12. I resigned from holding a position with FOR in year 2010.

13. It is my understanding that there is less than a \$100,000 remaining in the FOR.

I certify that the above statements of fact are true. I acknowledge that if any of the

above statements of fact are willfully false, I am subject to punishment.

Dated: June 5, 2018

Jedidiah Perr